

REMARKS

By this Amendment, claims 21, 25, 29 and 33 are amended. No new matter is added. Accordingly, after entry of this Amendment, claims 21-36 will remain pending in the patent application. Reconsideration and allowance of the present patent application based on the foregoing amendments and following remarks are respectfully requested.

Claims 21, 25, 29 and 33 were rejected under 35 U.S.C. §112, second paragraph. The rejection is respectfully traversed.

Claims 21, 25, 29 and 33 are amended to provide antecedent basis to the recitation "the registered device." It is respectfully submitted that the amendments to claims 21, 25, 29 and 33 obviate the rejection. Accordingly, reconsideration and withdrawal of the rejection of claims 21, 25, 29 and 33 under 35 U.S.C. §112, second paragraph, are respectfully requested.

Claims 21-36 were rejected under 35 U.S.C. §102(e) based on Shteyn *et al.* (U.S. Pat. No. 6,163,817) (hereinafter "Shteyn"). The rejection is respectfully traversed.

Claim 21 is patentable over Shteyn at least because this claim recites a method of controlling a device connected to a network, said device being configured to handle both a first control command sent from the network and a second control command sent from an operation unit being independent of the network, and said device having the capability of controlling oneself as well as the capability of being controlled by a different device connected to the network, said method comprising, *inter alia*, upon selecting the first mode, the second control command being received to execute it, and the first control command being rejected; and upon selecting the second mode, any of the first and second control commands being received to execute it, wherein said different device is configured to be registered as a registered device, said method further comprising: in the first mode, said device being configured to reject a control command from the registered device; even in the second mode, said device being configured to reject a control command if this command is not sent from the registered device, the rejection of the control command being independent of a password; and in the second mode, said device being configured to execute given processing corresponding to a control command if this command is sent from the registered device. Shteyn does not disclose, teach or suggest a method including these features. Therefore, Shteyn does not disclose, teach or suggest each and every feature recited by claim 21 and, as a result, cannot anticipate claim 21.

Shteyn merely discloses an information processing system including sub-systems and a control means for controlling the sub-systems. Shteyn discloses that the sub-systems are

capable of interacting directly with one another without the control means being involved. (See col. 3, lines 47-51). Shteyn teaches that before the peer-to-peer communication takes place, sub-systems are de-registered with the control means so as to have their software representations functionally withdrawn. (See col. 3, lines 51-54 and col. 4, lines 52-58). As a result of the de-registration of the sub-systems with the control means, the control means does not interact with the sub-systems and, therefore, does not issue a control command. In other words, the issuance of a control command by the control means is suppressed with the de-registration of a sub-system. Shteyn is, however, silent about a system that is configured to reject a control command from a registered device. Contrary to Shteyn, the device of claim 21 is not de-registered from the network and does not suppress the device control. Rather, the device of claim 21 can always issue control command(s) and/or reject a control command. Therefore, for at least this reason, Shteyn cannot anticipate claim 21.

It is also respectfully submitted that Shteyn fails to disclose, teach or suggest the features of the second mode as recited in claim 21. Shteyn merely discloses keeping a mode in which a control is disabled. For example, Shteyn discloses that sub-systems can be disconnected from the control means and the rest of the information processing network independently of one another. (See col. 6, lines 9-12). Shteyn further discloses that the UI module in the software representation of one or more of the sub-systems can be manipulated for scheduling/configuration purposes without directing any output to the disconnected one(s) of the sub-systems. (See col. 6, lines 37-41). However, Shteyn does not disclose rejecting a control command. In claim 21, if a command is sent from a non-registered device, this command is rejected, even if the system is in a mode in which a control command is enabled. Shteyn does not disclose, teach or suggest such a feature.

Claims 22-24 are patentable over Shteyn at least by virtue of their dependency from claim 21 and for the additional features recited therein. For example, with respect to claim 22, Shteyn does not teach or suggest that the user sets the first or second mode, as defined in claim 21. Furthermore, with respect to claim 23, Shteyn is silent about setting the network interface in a power-off state or in a power saving state upon power off in the first mode. Shteyn merely discloses a priority schedule of resources, compute power and bandwidth. (See col. 5, lines 17-27).

Claim 25 is patentable over Shteyn at least for similar reasons as provided above in connection with claim 21. Namely, claim 25 is patentable over Shteyn at least because this claim recites a method comprising, *inter alia*, upon selecting the first mode, the second control command being received to execute it, and the first control command being rejected;

and upon selecting the second mode, any of the first and second control commands being received to execute it, wherein said different device is configured to be registered as a registered device, said method further comprising: in the first mode, said device being configured to reject a control command if this command is not sent from the registered device, the rejection of the control command being independent of a password; also in the first mode, said device being configured to execute given processing corresponding to a control command if this command is sent from the registered device; and in the second mode, said device being configured to execute given processing corresponding to a control command. Shteyn does not disclose, teach or suggest these features. Therefore, Shteyn cannot anticipate claim 25.

Claims 26-28 are patentable over Shteyn at least by virtue of their dependency from claim 25 and for the additional features recited therein.

Claim 29 is patentable over Shteyn at least because this claim recites an apparatus connectable, via a serial bus, to a device being configured to provide one or more control commands, said apparatus comprising, *inter alia*, a first portion configured to reject the control command from said device in the first mode, such that said apparatus can control oneself but cannot be controlled by said device, a second portion configured to accept the control command from said device in the second mode, such that said apparatus can control oneself and can be controlled by said device, a third portion configured to register a prescribed said device as a registered device, a fourth portion configured to reject the control command from said device in the first mode, a fifth portion configured to reject the control command from an unregistered device, even in the second mode, the rejection of the control command being independent of a password, and a sixth portion configured to execute given processing corresponding to the control command sent from the registered device. Shteyn does not disclose, teach or suggest these features. Therefore, Shteyn does not disclose, teach or suggest each and every feature recited by claim 29 and, as a result, cannot anticipate claim 29.

Shteyn merely discloses that sub-systems can be disconnected from, or de-registered with, the control means and the rest of the information processing network independently of one another. (*See* col. 6, lines 9-12). Shteyn is, however, completely silent about a first portion configured to reject the control command from said device in the first mode.

Furthermore, Shteyn is completely silent about the second, third, fourth, fifth and sixth portions as recited in claim 29. Shteyn merely discloses that a sub-system (102) initiates the disconnecting process by sending messages to its peers 104 and 106, and that a

specific one of sub-systems 104 and 106 may be disconnected from control means before a specific peer-command is received. (*See* col. 6, lines 14-41). Therefore, Shteyn merely discloses a mode in which a control is disabled (by disconnecting the sub-systems from the control means). Shteyn does not, however, disclose, teach or suggest a fifth portion configured to execute given processing corresponding to the control command sent from the registered device, even in the first mode. Contrary to Shteyn, registered and unregistered devices in claim 29 remain connected and are able to send control commands.

Claims 30-32 are patentable over Shteyn at least by virtue of their dependency from claim 29 and for the additional features recited therein.

Claim 33 is patentable over Shteyn at least for similar reasons as provided in claim 29 and for the additional features recited therein. Namely, claim 33 is patentable over Shteyn at least because this claim recites an apparatus connectable, via a serial bus, to a device being configured to provide one or more control commands, said apparatus comprising, *inter alia*, a first portion configured to reject the control command from said device in the first mode, such that said apparatus can control oneself but cannot be controlled by said device, a second portion configured to accept the control command from the said device in the second mode, such that said apparatus can control oneself and can be controlled by said device, a third portion configured to register said device as a registered device, a fourth portion configured to reject the control command from an unregistered device in the first mode, the rejection of the control command being independent of a password, a fifth portion configured to execute given processing corresponding to the control command sent from the registered device, even in the first mode, and a sixth portion configured to execute given processing corresponding to the control command in the second mode. Shteyn does not disclose, teach or suggest these features. Therefore, Shteyn cannot anticipate claim 33.

Claims 34-36 are patentable over Shteyn at least by virtue of their dependency from claim 33 and for the additional features recited therein.

Accordingly, reconsideration and withdrawal of the rejection of claims 21-36 under 35 U.S.C. §102(e) based on Shteyn (U.S. Pat. No. 6,163,817) are respectfully requested.

The rejections having been addressed, Applicants request issuance of a notice of allowance indicating the allowability of all pending claims. If anything further is necessary to place the application in condition for allowance, Applicants request that the Examiner contact Applicants' undersigned representative at the telephone number listed below.

KONDA ET AL. -- 09/809,034  
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Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'C. Lair', is written over the printed name 'CHRISTOPHE F. LAIR'.

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